



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 14, 2023

**BY EMAIL & ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Juan Orlando Hernandez, S7 15 Cr. 379 (PKC)  
United States v. Juan Carlos Bonilla Valladares, S8 15 Cr. 379 (PKC)**

Dear Judge Castel:

The Government respectfully writes to request that the Court adjourn the deadline for its motion pursuant to Section 4 of the Classified Information Procedures Act ("CIPA") for approximately 60 days, from March 17, 2023 to May 17, 2023. The reasons for this request are set forth in a classified letter being submitted, for the reasons stated therein, *ex parte* and under seal. Defense counsel for Juan Orlando Hernandez have advised that they object to this motion for an adjournment of the Government's CIPA Section 4 deadline. Defense counsel for Juan Carlos Bonilla Valladares have advised that they consent to this motion.

Respectfully submitted,

DAMIAN WILLIAMS  
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Southern District of New York

By: /s/  
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cc: Defense Counsel (by ECF)